REMARKS

Claims 1, 3-12, 14, and 16-20 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Claims 1 and 6 have been rejected under 35 U.S.C. 103 (a) over Sundaresan (U.S. Patent No. 6,487,566) in view of Stechmann et al. (U.S. Patent No. 5,617,528), and further in view of Ross et al. (U.S. Patent No. 6,026,417). The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Ross teach or suggest all the limitations of claims 1 and 6.

Claim 1 claims, *inter alia*, "a card-based presentation generator connected to said presentation style transformer for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document." Claim 6 recites, *inter alia*, "card-based presentation generator means connected to said presentation style transformer means for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document."

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents (see col. 5, lines 1 to 7). Sundaresan teaches pattern matching and replacement of portions of a document (see col. 6, lines 28-33). Sundaresan does not teach or suggest "card-based presentation generator... for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document" as claimed in claims 1 and 6. Sundaresan teaches a cross transformation from one XML document to another XML document. Sundaresan teaches the replacement of portion of an XML document to arrive at another XML

document; only an XML document is provided. Thus, Sundaresan does not teach or suggest receiving markup language document content and providing an abstract description of formatting directives of a presentation document. Indeed the Examiner has suggested that Sundaresan does not explicitly disclose "card display schema" and "a card-based presentation generator". Therefore, Sundaresan fails to teach all the limitations of claims 1 and 6.

Stechmann discloses a method and apparatus for interactively creating photo identification cards (see Abstract). The method and apparatus for creating photo identification cards uses a predetermined card design that specifies positions on the card for layout frames of a video picture and cardholder information which are to be printed on the card (see col. 1, lines 54-62). Stechmann does not teach or suggest "card-based presentation generator... for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document" as claimed in claims 1 and 6. The card design of Stechmann is not a card-based presentation generator as claimed in claims 1 and 6. The card template of Stechmann is filled with user commands, cardholder information corresponding to cardholder information fields, and a video picture (see col. 1, lines 54-62). Nowhere does Stechmann teach or suggest that the card template receives markup language documents and provides an abstract description of formatting directives. Therefore, Stechmann does not teach or suggest a "card-based presentation generator... for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document" as claimed in claims 1 and 6. Respectfully, Stechmann fails to cure the deficiencies of Sundaresan.

Ross teaches a publisher program that allows the author of a content-filled document to use a menu-driven utility to automatically change a layout (see Technical Field). Ross teaches

that the publisher program includes four principle program modules; a menu-driven layout selection utility, a Wizard, a Page Manager, and an editor (see col. 9, lines 8-12). Ross does not teach or suggest a "card-based presentation generator... for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document" as claimed in claims 1 and 6. The modules of Ross function to change a layout of a document according to a user's changes to the formatting, position, or content (see col. 7, line 65). Ross does not teach or suggest a card-based presentation generator for providing an abstract description of formatting directives. The user selects layouts and formatting according to the teachings of Ross. Thus, none of Ross's modules receive markup language document content and provide an abstract description of formatting directives of a presentation document as claimed in claims 1 and 6. Therefore, Ross fails to cure the deficiencies of combined teachings of Sundaresan and Stechmann.

The combined teachings of Sundaresan, Stechmann, and Ross fail to teach or suggest a presentation style transformer for "card-based presentation generator... for receiving said card-based presentation specification and markup language document content and for providing an abstract description of formatting directives of a presentation document", essentially as claimed in claims 1 and 6. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 3, 5, 7, 10, 11, and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Sundaresan, Stechmann, and Ross as applied to claims 1 and 6, and further in view of Ferrel et al. (U.S. Patent No. 5,907,837). The Examiner stated essentially that Sundaresan, Stechmann, Ross, and Ferrel teach or suggest all the limitations of claims 3, 5, 7, 10, 11, and 16.

Claims 3 and 5 depend from claim 1. Claims 10 and 11 depend from claim 6. Claim 16

depends from claim 12. The dependent claims are believed to be allowable for at least the reasons given for claims 1, 6, and 12. At least claims 3 and 7 are believed to be allowable for additional reasons.

Claim 3 recites, *inter alia*, "wherein said presentation style transformer comprises: a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification." Claim 7 claims, *inter alia*, "wherein said presentation style transformer means comprises: resource generator means for receiving said card layout style specification and said card display schema and for providing presentation resource declarations of said card-based presentation specification; and style proceduralizer means for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification."

Multiple cited prior art references must suggest the desirability of being combined, and the references must be viewed without the benefit of hindsight afforded by the disclosure. The Examiner has chosen a multitude of references, apparently in hindsight, to reject claims 3 and 7, however, each reference relates to an entirely different art, for example, Sundaresan teaches W3C XSL style for XML to XML transformations including content replacement, Stechmann relates to an interactive system for matching content to information fields, Ross relates to changing a layout of content-filled desktop publishing documents in a windows OLE object environment, and Ferrel relates to dynamically finding and displaying content at runtime. Given the different fields of the references, and the lack of a suggestion or motivation to combine the references, these references are not believed to be combinable. Therefore, reconsideration of the rejections

is respectfully requested.

Assuming, arguendo, that the references are combinable, the combined teachings of Sundaresan, Stechmann, Ross, and Ferrel fail to teach or suggest all the limitations of claims 3 and 7.

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents (see col. 5, lines 1 to 7). Sundaresan teaches pattern matching and replacement of portions of a document (see col. 6, lines 28-33). Sundaresan does not teach or suggest "a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification" as claimed in claim 3 and essentially as claimed in claim 7. Sundaresan's cross transformation of XML documents does not teach or suggest a card-based presentation specification having presentation resource declarations or procedural card content mapping rules. Therefore, Sundaresan does not teach or suggest a resource generator or a style proceduralizer as claimed in claims 3 and 7. Accordingly, Sundaresan fails to teach all the limitations of claims 3 and 7.

Stechmann discloses a method and apparatus for interactively creating photo identification cards (see Abstract). Stechmann does not teach or suggest "a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification" as claimed in claim 3 and essentially

as claimed in claim 7. Nowhere does the card design of Stechmann teach or suggest a card-based presentation specification having presentation resource declarations or procedural card content mapping rules. The card template of Stechmann includes fields for receiving data, however no teaching or suggestion can be found in Stechmann that the presentation resource declarations are provided or that the card template is translated into procedural card content mapping rules. Therefore, Stechmann does not teach or suggest a resource generator or a style proceduralizer as claimed in claims 3 and 7. Stechmann fails to cure the deficiencies of Sundaresan.

Ross teaches a publisher program that allows the author of a content-filled document to use a menu-driven utility to automatically change a layout (see Technical Field). Ross teaches that the publisher program includes four principle program modules: a menu-driven layout selection utility, a Wizard, a Page Manager, and an editor (see col. 9, lines 8-12). Ross does not teach or suggest "a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification" as claimed in claim 3 and essentially as claimed in claim 7. Ross teaches that the user selects layouts and formatting. Thus, Ross does not teach or suggest a resource generator providing presentation resource declarations of said card-based presentation specification or a style proceduralizer translating a card layout style specification into procedural card content mapping rules. Ross does not teach or suggest a resource generator or a style proceduralizer as claimed in claims 3 and 7. Ross fails to cure the deficiencies of combined teachings of Sundaresan and Stechmann.

Indeed, as the Examiner suggested with respect to claims 3 and 7, Sundaresan,

Stechmann, and Ross do not explicitly disclose "resource generator and style proceduralizer". Applicants believe that Ferrel fails to cure the deficiencies of Sundaresan, Stechmann, and Ross.

Ferrel teaches a system for dynamically finding and displaying content at runtime (see col. 7, lines 13-18). Ferrel does not teach or suggest "a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification" as claimed in claim 3 and essentially as claimed in claim 7. The system of Ferrel does not provide presentation resource declarations of said card-based presentation specification or translate a card layout style specification into procedural card content mapping rules. Ferrel teaches finding content; Ferrel does not teach or suggest providing content or translating content. Thus, Ferrel does not teach or suggest a resource generator or a style proceduralizer as claimed in claims 3 and 7. Ferrel fails to cure the deficiencies of combined teachings of Sundaresan, Stechmann, and Ross.

The combined teachings of Sundaresan, Stechmann, Ross, and Ferrel fail to teach or suggest "a resource generator for receiving said card layout style specification and said card display schema and providing presentation resource declarations of said card-based presentation specification; and a style proceduralizer for translating said card layout style specification into procedural card content mapping rules of said card-based presentation specification" as claimed in claim 3 and essentially as claimed in claim 7. Therefore, the Examiner's reconsideration of the rejection is respectfully requested.

Claims 4, 8, and 9 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Sundaresan, Stechmann, Ross, Ferrel as applied to claims 1, 3, 5 to 7, 10, 11, and 16, and further

in view of Shimizu et al. (U.S. Patent No. 6,374,271). The Examiner stated essentially that Sundaresan, Stechmann, Ross, Ferrel, and Shimizu teach or suggest all the limitations of claims 4, 8, and 9.

Claim 4 depends from claim 1. Claims 8 and 9 depend from claim 6. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 6. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 12 has been rejected under 35 U.S.C. 103 (a) over Sundaresan in view of Stechmann. The Examiner stated essentially that the combined teachings of Sundaresan and Stechmann teach or suggest all the limitations of claim 12.

Claim 12 claims, *inter alia*, "translating declarative card layout style specifications into procedural card-based presentations."

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents. (See Col. 5, lines 1 to 7.) Sundaresan does not teach "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Sundaresan's method of translating one XML document into another XML document does not teach or suggest translating a declarative specification into a procedural specification. A cross transformation of XML documents begins and ends with the same type of document. Therefore, Sundaresan does not teach or suggest "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Therefore, Sundaresan fails to teach all the limitations of claim 12.

Stechmann discloses a method and apparatus for interactively creating photo identification cards (see Abstract). The method and apparatus for creating photo identification cards uses a predetermined card design that specifies positions on the card for layout frames of a

video picture and cardholder information which are to be printed on the card (see col. 1, lines 54-62). Stechmann does not teach or suggest "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Stechmann's method for creating photo identification cards does not teach or suggest a declarative card layout style specification, much less "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Nowhere does Stechmann teach or suggest that a card template is translated. Therefore, Stechmann fails cure the deficiencies of Sundaresan.

The combined teachings of Sundaresan and Stechmann fail to teach or suggest all the limitations of claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 14 has been rejected under 35 U.S.C. 103 (a) over Sundaresan and Stechmann as applied to claim 14, and further in view of Shimizu. The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Shimizu teach or suggest all the limitations of claim 14.

Claim 14 depends from claim 12. Claim 14 is believed to be allowable for at least the reasons given for claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

New claims 17 and 18, and 19 and 20 depend from claims 1 and 6, respectively. The new claims are believed to be allowable for at least the reasons given for claims 1 and 6.

For the forgoing reasons, the present application, including claims 1, 3-12, 14, and 16-20, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

By: Donald B. Paschburg

Donald B. Paschburg
Reg. No. 33,753
Attorney for Applicants

SIEMENS CORPORATION
Intellectual Property Department
5th Floor
170 Wood Avenue South
Iselin, New Jersey 08830
(732) 321-3191
(732) 321-3030 (FAX)